

Town Planning and Heritage Statement

5G Electronic Communications Base Station

At Muswell Hill ATE, Grand Avenue, London, W1J 5RR

Site Reference CellnexSS/Muswell Hill ATE/COM-0020406

CELLNEX UK CTIL

July 2023

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for planning permission for a 5G mobile base station for the mobile network operator(s) (MNOs) *Vodafone Ltd in conjunction with Cornerstone*. The application site is owned / operated by Cellnex UK, a radio site infrastructure provider.
- 1.2 The application includes:
- A description of the site and surrounding area
 - A description of the proposal
 - A statement of community engagement
 - A review of planning policy considerations
 - A review of design and access considerations
- 1.3 A number of other accompanying documents have been submitted in support of the application and these are referred to and must be read in conjunction with this statement.

2. SITE AND SURROUNDING AREA

- 2.1 The application site is located on the roof of the Muswell Hill Telephone Exchange, a two-storey building of brick construction. Dating back to the 1930's, the Telephone Exchange currently provides telephone and broadband services to 16,296 residential and 783 non-residential premises in Muswell Hill plus Colney Hatch, Cranley Gardens and Fortis Green. Whilst the building itself is unlisted, it is located within the Muswell Hill Conservation Area. The building is located on Grand Avenue and is surrounded by residential properties on all sides. There are no listed buildings within close proximity to the site.

Photograph 1: The Telephone Exchange Viewed from Grand Avenue



- 2.2 In addition to its primary use as a telephone exchange as part of BT's property portfolio, the roof of the building is a long-standing telecommunications site and is presently host to electronic communications equipment operated by Vodafone. This comprises antennas and transmission dishes installed on free-standing support poles, equipment cabinets, and ancillary equipment.

Considering that the telecommunications equipment is already in situ on the roof of the telephone exchange, along with the scale of the works being proposed in this instance, it is not thought that this proposal would result in any signification detrimental or demonstrable visual harm.

As this proposal is for the upgrading of an existing telecommunications base station, there is a host of relevant planning history. This history shows that the Muswell Hill Telephone Exchange is an established host of telecommunications equipment. However, upon searching the Councils website, no telecommunications record could be found.

That being said, the existence of rooftop equipment sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above, the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

3. THE 5G PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for a new 5G electronic communications base station. The deployment of 5G will utilise the MNOs existing 3G and 4G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity network apparatus subject of this application.
- 3.2 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station apparatus on the rooftop of the building. To help explain this important detail, we have set this out in the accompanying **“5G Technical Support”** document, which must be read in conjunction with this planning statement.
- 3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document. A description of the proposal is as follows.
- ***Sector 1: The removal of the current existing GRP shrouding on the exchange rooftop. This is due to the installation of 1 x new AIR 3227 antenna at 14.9m which will be installed to the existing steel work and painted to match existing brickwork.***
 - ***Sector 2 & 3: The removal of the current existing GRP shrouding on the exchange rooftop. This is due to the installation of 2 x new AIR 3227 antenna at 13.7m which will be installed to the existing steel work and painted to match existing brickwork.***
 - ***There will also be the removal of the large CTIL free standing GRP cabinet access platform with handrails from the rooftop. At ground level there will be the removal of the existing meter cabinet to be replaced by 1 x new Siemens Meter cabinet.***
 - ***Ancillary works will see the refreshment of 1 x CSC cabinets on existing plinth on the rooftop and the installation of 3 x 6-pair multicore fibre cables within existing feeder management.***

- 3.4 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.
- 3.5 Paragraphs 16 & 17 of the Code of Practice for Wireless Network Development in England, published in March 2022, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for 5G and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex UK.
- 3.6 The application site has been selected by the operator as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communication sites, in this case owned / operated by Cellnex UK.

4. PRIOR ENGAGEMENT

- 4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received a red rating when assessed against the traffic light rating model as referenced in the Code of Practice.
- 4.2 In our engagement letter we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community and obtain your comments on the siting and design of the development.
- 4.3 Informal pre-application engagement was sent to The London Borough of Haringey on the 14/06/2023. Regrettably we have not received any response from your authority and accordingly we would be pleased to address any necessary matters within the determination period of the application.
- 4.4 Additionally, further consultation was undertaken with Ward Councillors Cathy Brennan and Pippa Connor of the Muswell Hill Ward, Greygates Day Nursery, St James CofE Primary School, Tetherdown Primary, and the Treehouse School, as well as 27 residential properties that lie within proximity to the proposed location. No response was received from any of the contacted parties in this instance.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- The local policy framework set out in the adopted Development Management Plan (adopted July 2017) and the Strategic Policies Plan (adopted March 2013).
- Muswell Hill Conservation Area Character Appraisal
- The Code of Practice for Wireless Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '**National Policy - Delivering Ultra-Fast Broadband Mobile Connectivity**', sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document '**5G – Helping tackle climate change**'.

- 5.21 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should therefore be acceptable. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, planning permission should be granted.

Local Policy Considerations

- 5.22 Section 70 of the Town and Country Planning Act 1990, as amended, requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

At local level, the proposal has been considered against the London Borough of Haringey's development plan, particularly the Strategic Policies Plan: 2013 – 2026 (adopted March 2013) and the Development Management Plan (adopted July 2017). The Strategic Policies Plan sets out the vision and key policies for the future development of the borough. The Development Management Plan sets out criteria-based policies against which planning applications will be assessed. The following policies found within the Strategic Policies Plan and the Development Management Plan are relevant to the assessment of this application.

Policy DM54: Facilitating Telecommunications Development (Development Management Plan)

The council will promote the development of advanced, high-quality communications infrastructure to support economic growth and more accessible, inclusive communities. This will be achieved by requiring new development proposals to:

- A) be designed in such a way as to be capable of facilitating delivery of high-speed broadband technology;*
- B) demonstrate how they will improve communications infrastructure in areas of poor broadband connectivity, as identified in Haringey's infrastructure delivery*

- plan, including through connection of the development to a nearby trunk network; and*
- C) deliver “ultrafast” connections in regeneration areas; and*
- D) be designed to meet the requirements of policy dm3.*

The following policy justifications are also relevant in this instance as they provide more context

7.30 The NPPF requires the council to facilitate telecommunications development, including high speed broadband technology as essential for sustainable economic growth and in enhancing the provision of local community facilities and services, while ensuring as far as possible that any visual impact of the structure on valued features of the borough’s environment is minimised.

Policy DM3: Public Realm (Development Management Plan)

The following aspects of policy DM3 are relevant to the assessment of this application.

Proposals for the installation of telecommunications equipment will be permitted where:

- a) It is demonstrated the equipment is limited to the minimum operational requirement, which should include any future-proofing requirements to accommodate anticipated improvements in infrastructure;*
- b) Opportunities for sharing facilities, such as masts, cabinet boxes and satellite dishes, and erecting antennae on existing buildings or other structures has been fully explored*
- c) and taken advantage of;*
- d) There is no significant adverse impact on the visual amenity of neighbouring occupiers;*
- e) There is no adverse effect on the external appearance of the building, street scene, or spaces in which they are located;*
- f) The size of any equipment visible from the street is minimised (including satellite dishes, other domestic equipment and any supporting structures);*
- g) They are located discretely and do not detract from the special character and appearance of heritage assets or conservation area (see Policy DM9);*

- h) They are appropriately designed, coloured and landscaped. For dishes, this may include installing a mesh or transparent structure;*
- i) A minimum residual footway width on main pedestrian roads is preserved, in line with the Manual for Streets.*

All telecommunications equipment should be removed as soon as reasonably practicable after it is no longer required.

Policy DM1: Delivering High Quality Design (Development Management Plan)

The following aspects of policy DM1 are relevant to the assessment of this application.

All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:

- a) Relate positively to neighbouring structures, new or old, to create a harmonious whole;*
- b) Make a positive contribution to a place, improving the character and quality of an area;*
- c) Confidently address feedback from local consultation;*
- d) Demonstrate how the quality of the development will be secured when it is built; and*
- e) Are inclusive and incorporate sustainable design and construction principles.*

Policy SP16: Community Facilities (Strategic Policies Plan)

The council will work with its partners to ensure that Appropriate improvement and enhancements, and where possible, protection of community facilities and services are provided for Haringey's communities. (This includes telecommunications services).

Policy DM9: Management of the Historic Environment (Development Management Plan)

The following aspects of policy DM9 are relevant to the assessment of this application.

Haringey's Heritage Assets

- a) Development that conserves and enhances the significance of a heritage asset and its setting will be supported.
- b) Proposals affecting a designated or nondesignated heritage asset and its setting will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance. Applicants are required to submit with their planning application a statement describing the significance of the heritage asset(s) concerned, including any contribution made by its setting, along with an assessment and justification of the impact of the new development on the asset and its setting.
- c) When considering the impact of proposals on the historic environment, the Council will have regard to:
 - The priority given to sustaining and enhancing the significance of a heritage asset and its setting;
 - Character appraisals and management plans
 - or other guidance, where they are available;
 - The preservation or reinstatement of original or historic form, fabric, function or character of the asset and its setting;
 - The relationship with adjoining and neighbouring uses, particularly where these are heritage assets of significance in their own right;
 - The desirability of securing a viable use for a heritage asset consistent with its conservation;
 - An understanding of and respect for significance of heritage assets as parts of measures to mitigate and adapt to climate change; and
 - The contribution that the sensitive utilisation of heritage assets can make to sustainable regeneration.

Conservation Areas

- d) Subject to (A-C) above the Council will give consideration to, and support where appropriate, proposals for the sensitive redevelopment of sites and buildings where these detract from the character and appearance of a Conservation Area and its setting, provided that they are compatible with and/or complement the special characteristics and significance of the area.
- e) Proposals for alterations and extensions to existing buildings in Conservation Areas should complement the architectural style, scale, proportions, materials and details of the host building and should not appear overbearing or intrusive.

- 5.23 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator(s) and minimising environmental impact.

6. DESIGN CONSIDERATIONS

- 6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors addressed from Paragraph 20 of the Code of Practice.

Physical Context

- 6.2 ***To refer back to Section 2 and the particular features that make the site a suitable choice and/or have been responded to in the design.***

Amount, Design, Layout and Scale of the Development

- 6.3 The scale, layout and design of the development has been guided by the special 5G technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact. With regard to the main component elements of the development proposed

- **Kept in proportion to the building or structure**

The scale of the apparatus is not large and when installed should look proportionate to the structure as a whole. The antennas are similar to the existing electronic communications apparatus installed on the building although higher and closer to the edge of the rooftop to meet the especial technical and operational requirements of 5G. They will therefore be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building or look out of place within the heritage area.

- **Respect architectural style**

Within the severe technical constraints, the apparatus shall be installed in a manner that respects architectural style. Architecture and its style are about function as well as pure design. The telephone exchange, although within the heritage asset, was designed to provide local connections to the electronic

communications networks and has a utilitarian appearance, more in contrast with other heritage buildings within the area. Mobile phone base stations are a more modern wireless form of telephone exchange, but still require many of the operational attributes present. The development proposed therefore fully reflects the function of the exchange and the apparatus proposed can be viewed as an evolutionary requirement. In similar fashion, for example, a railway station, i.e. development required for another form of communications, which now may form part of our built heritage still has to evolve in accordance with new technology and safety requirements. In turn these translate into an array of structures that were often never envisaged when first built and now common within urban environments including those that may be designated for their heritage interest.

- **Have minimal impact above the roofline commensurate with technical constraints**

The apparatus that projects above the roofline has been kept to the minimum having regard to the technical parameters and design considerations explained above. The impact on the apparatus remains contained and new views towards this apparatus from elsewhere within the Conservation Area remain limited

- **Not be detrimental to views and general skyline**

A combination of design, topography and natural and manmade features should help keep any perceived changes to views and the skyline to within acceptable limits. Indeed, within the context of this urban location the attention of the casual observer is likely to remain be focussed more upon the streetscape.

- **Avoid creating clutter**

The apparatus should not look unduly cluttered and insofar as it might be visible it will be viewed as operational electronic communications equipment compatible and now expected on a building designed and constructed exclusively for electronic communications purposes.

- **Use clean lines and maintain symmetry**

The apparatus has clean lines and has been sited to maintain symmetry with both the building and its different elements.

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide 5G coverage and to link this site back into the operator's network. The design of these features is very much driven by operational and technical factors.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be in reasonable proximity to the antenna systems and dishes that they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Planning Assessment

Modern cities are required to provide both residents and visitors with digital connectivity to enable their day to day living and enjoy recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability.

This proposal would see the upgrading of an existing telecommunications base station to deliver 5G mobile connectivity to meet the Governments Digital Strategy and to bring about the significant benefits associated with this advanced next generation mobile connectivity. As the proposal will only see the addition of new antennas to equipment that is already in situ, it is considered that any impact in terms of siting would not be a consideration in this instance given the principle would not be in question. Any building or property that has a direct view of the telephone exchange already has visibility of the existing equipment, to which this proposal is of a similar design and height. It is therefore clear that this proposal would NOT alter the existing landscape setting in any distinguishable manner.

Part of the proposal will see all equipment painted to match the bricks of the telephone exchange by a specialist contractor. This will allow the equipment to blend with the surroundings and limit the visual impact of proposal. This meets the aims of Policy DM3 and DM1 found in the Development Management Plan. Painting the equipment to match the bricks of the telephone exchange will limit any visual harm and the equipment will blend with the existing structure. This would ultimately prevent any negative outlook in this instance.

In addition to the above, the proposal meets many of the aims of Policy DM3. The proposed equipment is limited to the minimal operational requirement to ensure adequate capacity and connectivity. This proposal takes advantage of an existing base station to ensure that the number of masts within the Council's area are kept to a minimum. As the proposed equipment will be located towards the Southern side of the telephone exchange, the equipment will not be visible when travelling along Grand Avenue, as is currently the case. This further limits the visual impact of the proposal and meets the aims of Policy DM3 and DM54.

It is important to stress that the outlook the building will not be markedly different in this instance. The finished works will leave the building looking almost exactly as it is now. The added benefits of the proposal and the minimal visual differentiation make this proposal ideal in regards to the planning landscape and outcome.

In relation to the above, the benefits that this proposal would bring to the wider community greatly outweigh any harm. As a rooftop site, this proposal ensures that footpaths and the public realm will remain clutter free, accessible, safe and attractive. The proposed works will largely be unseen from ground level. In particular, the siting, height, and design of this proposal will not cause harm to the character or appearance of the areas or the building on which it is located. In this instance, the proposal will not harm the surrounding area or the building it is to be located; but it will provide a great service to the surrounding community whilst meeting the aims of the Governments Digital Strategy

The Need to Conserve the Historic Environment

- 5.8 Paragraph 195 of the NPPF notes that Local Planning Authorities should take into account the significance of any heritage assets that may be affected by a proposal. This is done to avoid or minimise any conflict between the heritage assets conservation

and the proposed development. In this case the site is located within the Muswell Hill Conservation Area. As such, this heritage asset is considered as part of this design and heritage statement.

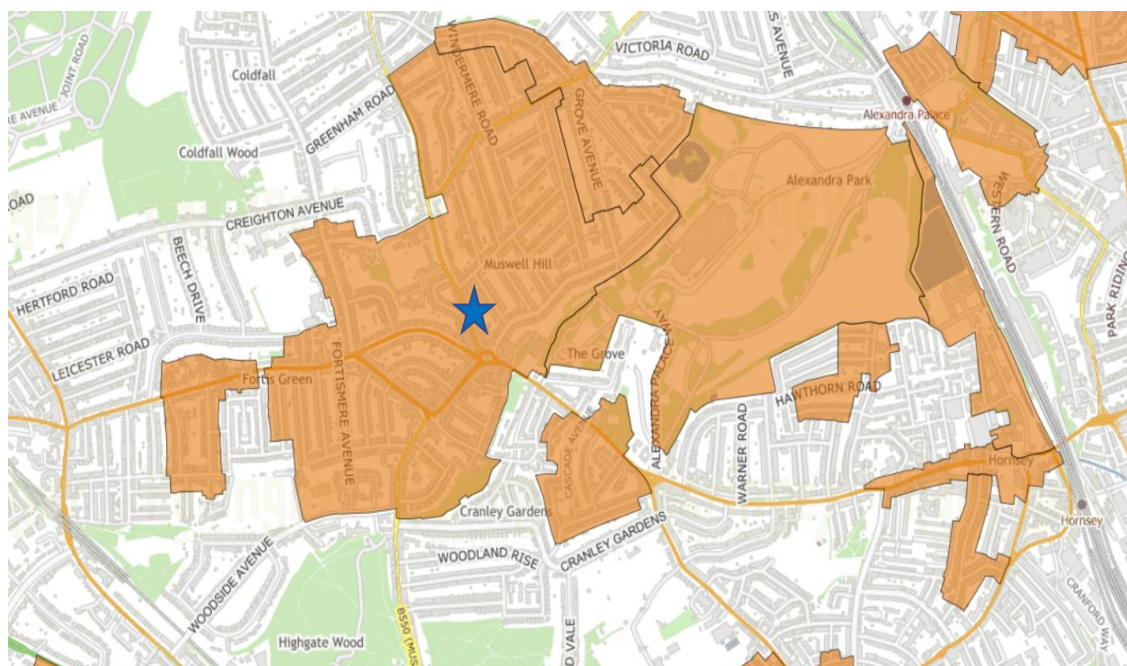
Heritage Statement

- 5.9 The Council have prepared a character appraisal for the Muswell Hill Conservation Area which provides a helpful summary of the history and character of the area.

First designated in March 1974, the designation sought to protect the area's generally unspoilt character. The Conservation Area was extended in September 1991 to include several roads towards to the North-East and West that reinforce the Edwardian Character of the core area. The boundary was extended once again in February 2008 by the addition of 5 small areas. The Muswell Hill Conservation Area has a long history with evidence of development dating back to the 12th Century.

Grand Avenue (the location of the Telephone Exchange) was planned as the main street within the estate developed to the West of Muswell Hill Road. There is considerable consistency along the street resulting in the uniform height of the properties, their relationship to the street, elevation treatment and detailing.

Image 2: A Boundary Map of the Muswell Hill Conservation Area (the area is identified with a blue star)



- 5.10 The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations within the Conservation Area is balanced by the need to conserve or enhance their heritage qualities.
- 5.11 However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.
- 5.12 In balancing these requirements, the starting point for planning new networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies, such as Cellnex UK. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.
- 5.13 In this instance, the installation of apparatus at this existing site owned or managed by Cellnex UK, where there are existing operations aligns with this longstanding policy.

- 5.14 Nonetheless, any potential harm the apparatus would cause to the designated heritage asset must be assessed, as set out in NPPF paragraph 195 and how to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. In this case, all reasonable steps have been taken, through careful siting at an existing Cellnex UK site, to moderate the visual impact of the development, having regard to technical and operational factors. Accordingly, the proposal looks to conserve the heritage asset.
- 5.15 In so far as there may be any perceived harm, the development proposal will have less than substantial harm to the significance of a designated heritage asset and as such, this harm has to be weighed against the public benefits of the proposal (paragraph 202). In this respect the base station is required as part of a national 5G mobile communications network, necessary to extend and improve mobile connectivity to the local area and has wider public interests. As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting of new apparatus within it.

Access Considerations

- 6.4 Access to the site will be provided via the roof of the Muswell Hill Telephone Exchange.
- 6.5 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.6 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

- 6.7 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with radio mast, which is the most visible component of the base station. As noted above, all the equipment will be painted by a specialist contractor to match the brick of the telephone exchange.

Appearance

- 6.9 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, as indicated above the local topography and camouflaged design should help minimise views. Insofar as the apparatus may be visible, they should look straight forward in appearance and reflect its function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure, such as roads and railways.

7. HEALTH AND SAFETY

- 7.1 In support of the application, we include a separate document called '**5G Health and Safety**' which sets out in more detail the associated health and safety considerations. Every installation on a site owned or managed by Cellnex UK will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.
- 7.2 The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 7.3 National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

8. SUMMARY AND CONCLUSIONS

- 8.1 In summary, the application is in respect of a 5G electronic communications base station necessary to improve a vital network that provides public services.
- 8.2 The service provided by the operator is in the public interest and is in very high demand, with 5G being the next and highly significant advancement in mobile connectivity. In the UK mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3 The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.
- 8.4 The operator's requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.5 The operator(s) has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex UK.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
 - Engagement in accordance with the Code of Practice procedures.
 - An examination of design options to try and minimise potential visual impact.
- 8.6 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.
- 8.7 This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in particular within the NPPF. In particular it is a form of development that is

specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

- 8.8 In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting approval applies.